

## REMARKS

Applicants appreciate the thoroughness with which the Examiner has examined the above-identified application. Reconsideration is requested in view of the amendments above and the remarks below.

### Restriction Requirement

Applicants have cancelled claims 1, 2, 7-9 and 11-12 pursuant to Applicants' election of Group II claims 3-6, 10 and 13-15. The Examiner has stated that applicants did not distinctly and specifically point out the errors in the restriction requirement, thus treating applicants' election as an election without traverse. Applicants respectfully disagree. In the September 30, 2002 Response to Restriction Requirement, Applicants did indeed traverse the restriction requirement on the grounds that 35 U.S.C. § 121 authorizes restriction only when the claimed invention is "independent and distinct." Applicants argued that a search of the subject matter of Group II would necessarily require a search of the subject matter of Group I. Applicants hold the position that the method delineated by the Group II claims is not directed to an independent and distinct matter. Response To Restriction Requirement, p.1. Consequently, Applicants take exception to the Examiner's treatment of this election as an election without traverse.

### 35 U.S.C. § 112 Issues

The Examiner has rejected claims 3-6, 10, and 13-15 under 35 U.S.C. § 112, first paragraph, as containing subject matter which was not described in the

specification in such a way as to enable one skilled in the art to which it pertains, to make and/or use the invention. Specifically, the Examiner states that the detailed specification is "nothing more than a high level discussion of desired end results and input data." Applicants disagree for the reasons stated below.

The present invention keeps tracks of URLs that have been visited by a user, identifies the location of the exit point, and returns to the exact position of the exit point upon re-entry to the HTML file by computing which section of the HTML file to display. Specification, p.12, ll.15-19. Applicants respectfully submit that the disclosed methodology is provided in sufficient detail to enable a person of ordinary skill in the art to practice the instant invention. For the present application, a person of ordinary skill in the art is considered to be knowledgeable of software languages and program drafting suitable to program HTML files, and manipulate inputs and outputs to said files accordingly. The methodology of the present invention is detailed in the specification for a person of ordinary skill in the art, and includes checking to assess whether a URL identifier is in a URL table; displaying the URL if the URL is not in a table; performing a cyclic redundancy check (CRC) if the URL is in the table; and retrieving the last position if the URL is not new, else displaying the URL at the beginning. Specification, p.13, ll.7-12; Fig. 1. These method steps can be implemented through a variety of programming techniques and/or different software functions as persons of ordinary skill in the art may determine to their own level of sophistication and experience. Applicants submit that the novelty of the instant invention does not lie in the detailed programming code necessary to carry out any

individual method step, rather it lies in the implementation of the method steps as a whole, in a manner delineated by the specification and the figures. Applicants anticipate that persons of ordinary skill in the art are capable of generating code to perform the method steps. The disclosure teaches a person of ordinary skill in the art, cognizant of programming applicable software code, to assess whether a URL identifier is in a URL table, display the URL, perform a cyclic redundancy check (CRC), and retrieve the last position if the URL is not new, else displaying the URL at the beginning. These represent specific method steps, detailed in the specification and illustrated in program flow charts (Figs. 1 and 2). There is no requirement that specific program code be suggested, since persons of ordinary skill may seek to choose various ways to implement the method steps.

The methodology of the present invention further requires that the URL be checked to see if it has changed since the last time it was accessed by comparing the cyclic redundancy check (CRC) number that was just done with a stored CRC number from the URL table. The user is queried for this option. If the URL is new, it is displayed at the beginning of the HTML file, otherwise the last position is acquired. Specification, p.13, ll.13-18; Fig. 2. The above-identified underlined method actions distinctly call out each method step necessary to implement the present invention, giving direction to persons of ordinary skill in the art as to which step is to be performed and its relation to other method steps.

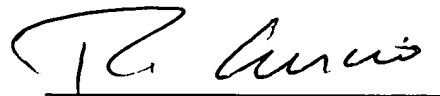
Next the method requires obtaining the line number of the last line of the HTML file that was displayed. Once displayed, the HTML file is scrolled forward or

backward using the web browser. The line number of the last line of the HTML file that was displayed is then retrieved. A second check is then performed to inquire if the URL is in the URL table. If not, the URL and CRC are added to the table. If the URL was in the URL table, a new position is updated. This is accomplished by adding the last line of the HTML file to the URL table. Specification, pg.14, ll.4-12. Again, these specific steps are delineated to teach one of ordinary skill in the art the methodology of the present invention. Applicants respectfully submit that the method steps taught in the disclosure do not simply represent a high level discussion of desired end results. For example, independent claim 3 as further narrowed by dependent claim 5 together establish concrete limitations to one embodiment of the present invention, which include providing a first multi-screen HTML file, traversing and displaying a screen of the multi-screen HTML file, identifying the first exit point location, returning to the first exit point upon reentry from a screen of a second HTML file, logging a cyclic redundancy number, comparing a current cyclic redundancy number with the logged cyclic redundancy number, and returning to the screen of the first multi-screen HTML file that contains the last of the hyperlinks previously viewed. Applicants respectfully submit that this claimed methodology amounts to significantly more than "a suggestion" of end results, and teaches a person of ordinary skill in the art a method for monitoring a multi-screen HTML file exit point.

It is respectfully submitted that the application remains in a condition where allowance of the entire case is proper. Reconsideration and issuance of a Notice of

Allowance are respectfully solicited. Should the Examiner not find the claims to be allowable, Applicants' attorney respectfully requests that the Examiner call the undersigned to clarify any issue and/or to place the case in condition for allowance.

Respectfully submitted,



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**CERTIFICATE OF MAILING**

I hereby certify that this correspondence is being deposited with the United States Postal Service on the date indicated below as first class mail in an envelope addressed to the Assistant Commissioner of Patents and Trademarks, Washington, D.C. 20231.

Name: Kara Laudano Date: 3.21.03 Signature: 